West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-03300100-2007
Application Received: November 1, 2002
Plant Identification Number: 03300100
Permittee: Dominion Transmission, Inc
Facility Name: Bridgeport Compressor Station
Mailing Address: 445 West Main Street
Clarksburg, WV 26301

Physical Location: Bridgeport, Harrison County, West Virginia
UTM Coordinates: 567.05 km Easting • 4355.39 km Northing • Zone 17
Directions: Exit # 125 off I-79. Proceed north on Route 73 for approximately ½ mile. Bridgeport Station is located on the right.

Facility Description

Bridgeport Compressor Station is a natural gas facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 1100 HP natural gas fired reciprocating engines, one (1) 2.5 MMBtu/hr natural gas fired boiler, one (1) 0.75 MMBtu/hr glycol dehydration unit with flare, four (4) storage tanks of various sizes, and two (2) natural gas fired auxiliary microturbines rated at 60kw for emergency use.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	**Potential Emissions**	**2005 Actual Emissions**
Carbon Monoxide (CO)	65.42	36.1
Nitrogen Oxides (NO_X)	187.77	103.16
Particulate Matter (PM_{10})	1.41	0.42
Total Particulate Matter (TSP)	1.41	0.85
Sulfur Dioxide (SO_2)	0.07	0.03
Volatile Organic Compounds (VOC)	80.70	39.79

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2004 Actual Emissions
Total HAPs*	8.58	5.29

Some of the above HAPs may be counted as PM or VOCs.

* HAPs are not speciated because no applicability was triggered.

Title V Program Applicability Basis

This facility has the potential to emit 187.77 tons per year of NOx. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Construction
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. § 60.18	NSPS Flare requirements
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control fugitive particulate matter

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R13-1801E	August 26, 2004	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

Determinations and Justifications

Since the last modification of the existing permit, additional MRR (Monitoring, recordkeeping and reporting) has been added regarding the glycol dehydration system.

Calculations of particulate matter emissions using AP-42 factors for Natural Gas Combustion and Soot Formation at Flares (Sections 1.4-3 and 13.5-1, respectively) indicate that emissions from the flare are only a small fraction (<10%) of the mass limit established by 45CSR6. As a result of this finding and due to the nature of this control device, the visual emissions performance tests as per Section 5.4.1 of the permit may be used as an indicator of compliance with 45CSR6 requirements and shall be sufficient for compliance certification purposes.

According to 45 CSR §2-11, RBR01 is exempt from MRR (Monitoring, recordkeeping and reporting) requirements because RBR01's heat input is less than ten (10) million B.T.U's per hour.

The limitations set forth in Sections 5.1.10 thru 5.1.15 are established to ensure that the permittee operates and maintains a control device that reduces hazardous air pollutant emissions below the applicability threshold specified in 40 CFR Part 63, Subpart HHH.

The auxiliary generator (a 250 hp Waukesha engine) permitted in R13-1801E was replaced by 2 Capstone microturbines (AUX02 & AUX03). The microturbines are fueled on natural gas. Potentials emissions of microturbines (tabulated below) are below 45CSR13 requirement for permitting.

Unit	NOx (tpy)	CO (tpy)	VOC (tpy)	PM10 (tpy)	SO2 (tpy)	Total HAPs (tpy)
AUX02	0.13	0.08	0.05	0.04	0.023	0.03
AUX03	0.13	0.08	0.05	0.04	0.023	0.03
Total	0.26	0.16	0.10	0.08	0.046	0.06

The capstone microturbines do not have any applicable requirements.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR 64 - Engines do not have any control; Glycol Dehydration unit is not a major source of HAPs. Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.

Since the last Title V modification WVDEP has determined that 45CSR10 does not apply to gas fired engines.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: December 21, 2006
Ending Date: January 22, 2007

All written comments should be addressed to the following individual and office:

U.K.Bachhawat
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Comment: Condition 5.4.1(a) should be replaced with the following condition:

The permittee shall conduct visible emission checks and/or opacity monitoring for the flare (IC).

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient

lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at flare (IC) emission point for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at the flare (IC) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of Method 9 as soon a practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

Answer: In Condition 5.4.1 (a) of the permit:

"Conducting monthly visual emission checks in accordance with 40 CFR 60, Appendix A, Method 22 when the dehydration system is operating *to verify the absence of visible emissions* from the dehydrator flare"

was replaced with

"The permittee shall conduct visible emission checks and/or opacity monitoring for the flare (IC).

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

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